



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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New York, New York 10278*

February 21, 2025

VIA ECF

The Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Sean Combs*, 24 Cr. 542 (AS)

Dear Judge Subramanian:

The Government writes in response to the defendant's letter asking the Court to rule on its motion for a bill of particulars (the "Motion"), originally filed on October 15, 2024. (Dkt. No. 154 (the "Letter")). The Government continues to oppose the Motion, which was originally styled as a request for a bill of particulars identifying victims and has now been apparently broadened to encompass not only victim names, but also the names of a large number of potential Government witnesses. The defendant provides no persuasive basis for his request, which in any event will be fully satisfied when the Government provides the information on the schedule already set by the Court, and the request should accordingly be denied.

For the reasons set forth in detail in the Government's October 30, 2024 opposition to the Motion, premature identification of victims and witnesses carries significant risks in a case like this one, which involves numerous allegations of violence, coercion, obstruction of justice, and witness tampering. (See Dkt. No. 53 at 33-34 (citing, *inter alia*, *United States v. Kelly*, 19 Cr. 286 (AMD), 2020 WL 473613, at *1 (E.D.N.Y. Jan. 29, 2020))). Moreover, since filing the Motion, the defendant has received substantial additional disclosures—including terabytes of Rule 16 discovery—which provide him with more than sufficient information to prepare for trial. Most relevant to the instant request, on February 1, 2025, the Government provided the defendant with a 16-page Enterprise Letter, outlining in detail the racketeering activity and related conduct that the Government currently expects to prove at trial in connection with the charged racketeering conspiracy offense.¹ The Enterprise Letter described these acts in detail, including their approximate dates and the people involved—noting, for example, their titles at the defendant's company or providing other identifying features. In short, these additional disclosures undermine any claim by the defendant that he is not aware of the "nature of the charge pending against him"

¹ As previously communicated to the defendant, the Government will supplement the Enterprise Letter in the event that additional incidents are identified or if the Government obtains additional material information about the conduct described.

cc: all counsel of record